

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

MURRAY WALTER PISONY,
Plaintiff,

v.

COMMANDO CONSTRUCTION, INC. and
JAMES MCLEOD HOLDINGS INC.
Defendants.

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Civ. A. No. 6:17-cv-00055-RP-JCM

JURY DEMANDED

**DECLARATION OF JOHN T. WILSON IN SUPPORT OF PLAINTIFF MURRAY
WALTER PISONY'S RESPONSIVE CLAIM CONSTRUCTION BRIEF**

I, John T. Wilson, hereby state and declare as follows:

1. I provide this declaration in support of Plaintiff Murray Walter Pisony's Responsive Claim Construction Brief.

2. I am currently the principal of the law firm of Wilson Legal Group P.C. in Dallas, Texas and am an attorney for Plaintiff Murray Walter Pisony in the above-referenced case. I have personal knowledge of the facts stated herein.

3. Attached hereto as **Exhibit A** is a true and correct copy of CCI's April 30, 2018 Identification of Proposed Claim Terms and Phrases for Construction.

4. Attached hereto as **Exhibit B** is a true and correct copy of an email from Daisy Manning to counsel for Plaintiff dated May 18, 2018, 15:33 CST.

5. Attached as **Exhibit C** is a true and correct copy of the File Wrapper of United States Patent Application No. 12/539,740.

6. At the conference of counsel before the filing of the Joint Claim Construction Statement and after Plaintiff had done significant additional work, CCI notified Plaintiff that it was

again dropping half of the remaining claim terms and phrases it initially asserted required construction.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10th day of August 2018 in Dallas, Texas.

/s/ John T. Wilson
John T. Wilson